

Exhibit 11

Disparities Impact Statement



This tool can be used by all health care stakeholders to achieve health equity for racial and ethnic minorities, people with disabilities, sexual and gender minorities, individuals with limited English proficiency, and rural populations.

This worksheet has 5 steps:

- 1 Identify health disparities and priority populations
- 2 Define your goals
- 3 Establish your organization's health equity strategy
- 4 Determine what your organization needs to implement its strategy
- 5 Monitor and evaluate your progress

Health disparities—differences in health outcomes closely linked with social, economic, and environmental disadvantage—are often driven by the social conditions in which individuals live, learn, work, and play.



STEP 1:

Identify health disparities and priority populations

Use available data sources to help you identify and prioritize which population(s) and health disparities you want to address.

Stratifying measures and health outcomes by race and ethnicity can help you get started.



What data can you use to identify health disparities and/or your priority population(s)?

active population to target priority populations

What population(s) will you prioritize?

What health disparities do you want to address?

mental health
race/ethnicity
BAM gender identity

STEP 2:

Define your goals

Using the information from **STEP 1**, set out what you aim to do, by when, and with whom.

For example:

Implement a **Language Access Plan** for patients with limited English proficiency.

- Develop a high quality language access plan in Year 1 (short-term goal).
- Train 90% of staff on the language access plan in Year 2 (long-term goal).

What do you want to improve or accomplish?

Short-term goal:

Implement access plans for gender identity, mental health, & race

Long-term goal:

equal healthcare for all

STEP 3:

Establish your organization's health equity strategy

List out the actions needed to achieve your **STEP 2** improvement goals.

What specific actions are needed to achieve your organization's goals?

Actions to reach the short-term goal:

- research access plans
- meet with managers to find what fits our organization best

Actions to reach the long-term goal:

- implementation

STEP 4:

Determine what your organization needs to implement its health equity strategy

Identify the policy changes and resources needed to achieve your strategy from **STEP 3**. For example, more staff, leadership support, changes to policies, or investment in technology.

Stakeholder Engagement Plan

Important: Develop a roadmap for how your team will engage and collaborate with internal and external partners.

What policy changes and resources are needed to achieve your organization's goals?

Resources you already have (assets):

| | |
|--|--|
| | |
|--|--|

Resources and/or policy changes you still need (deficits):

| | |
|--|--|
| | |
|--|--|

STEP 5:

Monitor and evaluate your progress

Establish what you will measure and agree on a plan to track progress.

Set your baseline: measure before you take action.



What measures can you use to track progress?

Visit the CMS Measures Inventory for ideas.

Who is responsible for the evaluation and how frequently will they provide updates?

- Quality Manager
- Annually

Next: Complete the Action Plan to develop and implement a Disparities Action Statement.

Contact HealthEquityTA@cms.hhs.gov for assistance completing the Disparities Impact Statement.

ACTION PLAN

Fill out one for each improvement goal. Health Equity Technical Assistance is available for stakeholders completing the Disparities Impact Statement. Contact HealthEquityTA@cms.hhs.gov.

Health Equity Champion:

Quality Manager,
Courtney

Executive Sponsor:

Lead Physician,
Dr. Mark Lefler

Date:

7/1/22

Improvement Goal

What health disparity are you addressing and who is (are) your priority population(s)?


Health Disparity:

ethnicity/language barrier

Priority Populations(s):

Hispanic/Latino

| Goals | Action Steps | Resources & Key Stakeholders | Metrics | Measurable Outcomes/Impact |
|---|--|--|--|---|
| List out your short-term and long-term goals from Step 2. Add rows as needed. | List the action steps needed to achieve your goals. | List the resources needed to accomplish action steps, including key staff or stakeholders from the Stakeholder Engagement Plans. | What will you monitor? What data will you use to track progress and how often? | Consider the longer term outcomes: how will you evaluate the impact and sustainability of your actions? |
| Short-Term Goal - Identify a target patients whose primary language is Spanish | - Run a report within the EHR to identify patients who told us their primary language is Spanish | - Physicians & clinical staff - Front desk personnel - translator app or software | - Patient feedback | - Patient Feedback - How often Spanish speaking patients return for care |
| Long-Term Goal - Be able to converse with patients whose primary language is Spanish. | - train staff on translator app or software | | | |

2 Improvement Activities |  [Download 2 activities](#)

Create and Implement an Anti-Racism Plan

Create and implement an anti-racism plan using the CMS Disparities Impact Statement or other anti-racism planning tools. The plan should include a clinic-wide review of existing tools and policies, such as value statements or clinical practice guidelines, to ensure that they include and are aligned with a commitment to anti-racism and an understanding of race as a political and social construct, not a physiological one. The plan should also identify ways in which issues and gaps identified in the review can be addressed and should include target goals and milestones for addressing prioritized issues and gaps. This may also include an assessment and drafting of an organization's plan to prevent and address racism and/or improve language access and accessibility to ensure services are accessible and understandable for those seeking care. The MIPS eligible clinician or practice can also consider including in their plan ongoing training on anti-racism and/or other processes to support identifying explicit and implicit biases in patient care and addressing historic health inequities experienced by people of color. More information about elements of the CMS Disparities Impact Statement is detailed in the template and action plan document at <https://www.cms.gov/About-CMS/Agency-Information/OMH/Downloads/Disparities-Impact-Statement-508-rev102018.pdf>.

Subcategory Name

Achieving Health Equity

Activity Weighting

High

 Hide Details

Activity ID

IA_AHE_8

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